

**THE HARMAN FIRM, PC**

ATTORNEYS & COUNSELORS AT LAW

200 WEST 57<sup>th</sup> STREET, SUITE 900, NEW YORK, NEW YORK 10011

TELEPHONE 212 425 2600 FAX 212 202 3926

WWW.THEHARMANFIRM.COM

May 29, 2013

**VIA EMAIL (Furman\_NYSDChambers@nysd.uscourts.gov)**

Hon. Jesse M. Furman  
United States District Court  
for the Southern District of New York  
40 Centre Street, Room 2202  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 5/29/2013

**Re:    *Pla et al. v. Renaissance Equity Holdings et al.*,  
12 CV 5268 (JMF)**

Dear Judge Furman:

We represent the Plaintiffs in the above wage-and-hour matter.

Depositions of some of the Plaintiffs have occurred in only the last several days, although we have not yet received the corresponding transcripts. We respectfully request that the Court grant Plaintiffs the opportunity to supplement their Motion for Reconsideration with the testimony from the witnesses who have just been deposed.

In addition, Plaintiffs respectfully direct the Court's attention to the fact that we still have not had the opportunity to depose the person responsible for payroll administration about whose existence we just learned. Plaintiffs had attempted to notice his deposition for tomorrow, but Defendants have stated that they will not be available then.

Finally, lead counsel and our lead paralegal both have colds and another staff member is in Miami on another case, which is in addition to other work that I have now recently been assigned, including an opposition to a summary judgment motion as well as a separate Second Circuit submission, both by Friday.

For these reasons, Plaintiffs respectfully request until Friday, June 7, 2013<sup>1</sup> in order to apply adequate attention to amending their Complaint, submitting a joint proposed notice and order, moving for class certification under FED. R. CIV. P. 23, and submitting a reply brief to their Motion for Reconsideration of Your Honor's rulings.

---

<sup>1</sup> Plaintiffs would request enough time to at least receive copies of the deposition transcripts in order to zealously bring our clients' issues to the Court's attention, but request only seven (7) days as this is our second such request.

We thank the Court for its time and consideration.

Respectfully submitted,  
THE HARMAN FIRM, PC

s/  
Peter J. Andrews [PA-3295]

cc: Joshua A. Marcus, Esq. (via email, jmarcus@franklingringer.com)  
Walker G. Harman, Jr. (via email)

The Court notes that the amended complaint and joint proposed notice and order were due on May 24, 2013. The Court will grant plaintiffs until May 31, 2013 to file these materials, as a courtesy, but will not grant any longer extensions in light of the fact that they are already late.

Plaintiffs are granted until June 7, 2013, to file their reply to the motion for reconsideration and their Rule 23 class certification motion. Opposition to that motion is due two weeks thereafter; any reply one week after the opposition.

SO ORDERED.



May 29, 2013